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May 30, 2025

VIA ECF

Hon. Sanket J. Bulsara, U.S.D.J.
United States District Court
Eastern District of New York
100 Federal Plaza, Courtroom 930
Central Islip, New York 11722

Re: *Bullion Exchange LLC v. Bullion Shark LLC and Ekaterina Ovodova*
Case No.: 2:24-cv-00467-DG-JMW
Plaintiff's Letter-Motion for Leave to Exceed Word Limit for Objections to Report and Recommendation

Dear Judge Bulsara:

This firm, Bondar Legal P.C., represents Plaintiff Bullion Exchange LLC ("Plaintiff") in the above-referenced litigation. I respectfully submit this letter-motion seeking leave from the Court to modestly exceed the standard word limit prescribed for Plaintiff's Objections to Magistrate Judge Wicks' Report and Recommendations, dated May 15, 2025 ("R&R").

Pursuant to Your Honor's Individual Practice Rules, Section V.C., objections to a Magistrate Judge's report and recommendation are limited to 1,750 words. Plaintiff made every effort to articulate its objections with concision. However, due to the comprehensive nature of the R&R and the voluminous underlying pleadings, an extension of 500 words is respectfully requested to ensure that Plaintiff's Objections are adequately and thoroughly presented.

The necessity for this brief enlargement stems primarily from the scope and complexity of the matters addressed. The R&R concerns a motion seeking leave to file a Second Amended Complaint that itself spans 47 pages and contains over 12,000 words, detailing numerous allegations and legal claims. The R&R comprehensively addresses these extensive submissions. Consequently, to substantially and adequately respond to the various findings and recommendations therein, Plaintiff requires this modest additional length to ensure each point of objection is sufficiently developed and supported for the Court's consideration.

We also respectfully note that, in recognition of the case's complexity, all parties were previously granted leave to exceed applicable word limitations in connection with the briefing of the underlying motion addressed by the R&R. This current request for a minor extension is Plaintiff's first such request concerning objections to the R&R.

Therefore, for the foregoing reasons and in the interest of facilitating a complete record for the Court's review, Plaintiff respectfully requests leave to file and serve its Objections to the R&R, with such Objections not to exceed 2,250 words.

Plaintiff appreciates the Court's time and attention to this matter.

Respectfully submitted,

_____/s/_____

Eugene Bondar

Attorney for Plaintiff Bullion Exchange LLC

cc: All counsel of record (via ECF)